

IN THE UNITED STATES DISTRICT COURT FOR THE
EASTERN DISTRICT OF VIRGINIA

Alexandria Division

UNITED STATES OF AMERICA

v.

SAU HOONG LEE,

also known as

Siew Cheah,
Karlyn Cheah,
Teresa Li,
Claudia Lee,
Qin Pan,
Sri Yulieantiningsih,
Cindy Lin, and
Cindy Tran,

Defendant.

Criminal No. 1:19cr 62

STATEMENT OF FACTS

The United States and the defendant, SAU HOONG LEE (hereinafter, "the defendant"), agree that at trial, the United States would have proven the following facts beyond a reasonable doubt with admissible and credible evidence:

1. On or about the dates and in the locations listed below, in the Eastern District of Virginia, the defendant, SAU HOONG LEE, knowingly and unlawfully used without lawful authority a means of identification of another person in or affecting interstate or foreign commerce, in connection with any unlawful activity that constitutes a felony under any applicable state or local law. In specific, when stopped by police while driving vehicles on the dates and in the locations described below, the defendant provided what purported to be a Virginia driver's license in the name of Cindy Lin, with the intent to commit and in connection

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with the offense of uttering a public record, in violation of Section 18.2-168 of the Code of Virginia:

| <u>Date</u> | <u>Location</u> | <u>Vehicle</u> |
|--------------------|------------------|----------------|
| June 25, 2014 | Fairfax County | 2013 Ferrari |
| September 20, 2014 | Fairfax County | 2014 Porsche |
| November 13, 2015 | Fairfax County | 2016 Ferrari |
| June 24, 2016 | Brunswick County | 2017 Porsche |

2. On or about October 6, 2015, in Loudoun County, in the Eastern District of Virginia, the defendant, SAU HOONG LEE, knowingly and unlawfully possessed an identification document (other than one issued lawfully for the use of the possessor) or a false identification document with the intent such document be used to defraud the United States. In specific, the defendant used the driver's license of Cindy Lin to pass through a security checkpoint operated by the Transportation Security Administration at Washington Dulles International Airport.

3. On or about October 6, 2015, in Loudoun County, in the Eastern District of Virginia, the defendant, SAU HOONG LEE, during and in relation to felony violations enumerated in 18 U.S.C. § 1028A(c), knowingly and without lawful authority possessed and used a means of identification of another person. In specific, the defendant used the driver's license of Cindy Lin to (a) pass through a security checkpoint operated by the Transportation Security Administration, and thereby defraud the United States of America, in violation of 18 U.S.C. § 1028(a)(4); and (b) engage in a scheme to defraud United Airlines of its right to limit carriage on its airplane to passengers traveling under their actual identities, in violation of 18 U.S.C. § 1343.

4. The defendant is a native of Malaysia. In 2001, the defendant obtained a visa to visit the United States under the name SAU HOONG LEE, a citizen of Malaysia born in 1952.

5. In 2005, the defendant applied for asylum. Although her claim of asylum was denied in 2006, she was granted withholding of removal.

6. In or about 2013, the defendant met an individual referred to herein as "YD." The defendant proposed that YD purchase a new Porsche in his name and that the defendant would drive and make the payments on the car. The defendant incurred charges but repaid YD in excess of the expenses the defendant incurred.

7. Cindy Lin is a woman born in 1985. In July 2012, Cindy Lin was issued a Virginia driver's license.

8. In 2012, the defendant met Cindy Lin. In September 2012, the defendant obtained Cindy Lin's driver's license.

9. Between 2014 and 2017, the defendant used the name of "Cindy Lin."

10. In or about 2014, the defendant met an individual referred to herein as "WH." The defendant asked WH to register a 2013 Ferrari 458 Spider in his name, and to make the payments with money provided by the defendant. The defendant stated she would provide WH with the money for the vehicle payments, plus an additional 20 percent.

11. On June 15, 2014, the defendant used the identity and driver's license of Cindy Lin to board a Virgin America flight from Washington Dulles International Airport to Los Angeles, California.

12. On the following dates, the defendant used the identity and driver's license of Cindy Lin to board United Airlines flights to or from Washington Dulles International Airport:

| <u>Date</u> | <u>From</u> | <u>To</u> |
|-------------|-------------|-----------|
| 10/19/14 | Dulles | Honolulu |
| 10/27/14 | Denver | Dulles |
| 01/17/15 | Houston | Dulles |
| 05/17/15 | Portland | Dulles |
| 07/05/15 | Dulles | Portland |

| | | |
|----------|---------------|-------------|
| 07/10/15 | Portland | Dulles |
| 07/13/15 | Dulles | Houston |
| 07/24/15 | Denver | Dulles |
| 08/11/15 | New York | Dulles |
| 08/17/15 | Dulles | Dallas |
| 08/25/15 | Portland | Dulles |
| 09/30/15 | Los Angeles | Dulles |
| 10/06/15 | Dulles | Newark |
| 10/20/15 | Dulles | Los Angeles |
| 11/06/15 | Las Vegas | Dulles |
| 11/20/15 | New York | Dulles |
| 12/15/15 | Portland | Dulles |
| 12/20/15 | Dulles | Houston |
| 12/23/15 | Houston | Dulles |
| 01/26/16 | Dulles | Houston |
| 01/31/16 | Houston | Dulles |
| 02/07/16 | Dulles | Las Vegas |
| 04/24/16 | Houston | Dulles |
| 04/29/16 | Dulles | Houston |
| 05/15/16 | Houston | Dulles |
| 05/28/16 | Dulles | Houston |
| 06/07/16 | San Francisco | Dulles |

13. In order to board the flights described above with the tickets in the name of “Cindy Lin,” the defendant was required to present to the Transportation Security Administration identification in the name of “Cindy Lin.” The defendant used the driver’s license of Cindy Lin and a credit card in the name of “Cindy Lin” for the purpose of accessing domestic commercial airliners. When she presented the driver’s license of Cindy Lin to the Transportation Security Administration at a security checkpoint at Dulles International Airport, that driver’s license was an identification document that was used to defraud the United States.

14. On June 25, 2014, under the name “Cindy Lin,” the defendant was stopped for speeding in McLean, Virginia, in a 2013 Ferrari, registered to an individual referred to herein as WH of Rockville, Maryland. During the traffic stop, the defendant provided the police officer the Virginia driver’s license of Cindy Lin.

15. On September 20, 2014, under the name “Cindy Lin,” the defendant was stopped for speeding on the Dulles Toll Road in a 2014 Porsche, registered to an individual referred to herein

as YD, of Beaverton, Oregon. During the traffic stop, the defendant provided the Virginia driver's license of Cindy Lin.

16. On July 5, 2015, under the name "Cindy Lin," the defendant was stopped by Maryland State Police in Talbot County, Maryland, while driving a 2015 Porsche 911 Turbo bearing a Maryland license tag, and registered to WH. During the traffic stop, the defendant provided to the police officer the Virginia Driver's license of Cindy Lin.

17. On November 13, 2015, under the name "Cindy Lin," the defendant was stopped by Fairfax County Police on the Dulles Toll Road, while driving a 2016 Ferrari, bearing a Maryland license tag, and registered to WH. During the traffic stop, the defendant provided the police officer the Virginia Driver's license of Cindy Lin.

18. Between 2014 and 2016, Cindy Lin told the defendant that Cindy Lin's identity had been stolen, that credit cards had been opened in her name, and that someone was incurring traffic tickets while using her driver's license. On one occasion, the defendant had a lawyer contact the court to cause the dismissal of a speeding ticket that had been issued in the name of Cindy Lin, on the grounds that the driver was someone who had stolen Cindy Lin's driver's license.

19. In 2016, the defendant met and befriended an individual from Houston, Texas, referred to herein as "AP." The defendant identified herself to AP as Cindy Lin.

20. On June 24, 2016, under the name "Cindy Lin," the defendant was stopped by an officer of the Sheriff's Office in Brunswick County, Virginia, while driving a 2015 Porsche 911 Turbo bearing a Texas license plate, and registered to AP of Houston, Texas. During the traffic stop, the defendant provided the police officer the Virginia Driver's license of Cindy Lin.

21. In 2016, Cindy Lin realized that the defendant was the person who was using Cindy Lin's driver's license. Cindy Lin then telephoned the defendant, and asked where the defendant was. In response, the defendant said that she was in China.

^ Cindy Lin said that, 5/21/16
GPT

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22. In or about October 2016, the defendant met Quin Ru Pan, who was the mother of WH. At some point, Qun Ru Pan lost her Social Security card, Permanent Resident identification card, and Florida's driver's license.

23. In October 2017, FBI agents executed a warrant on the defendant's residence at 10000 Santa Monica Boulevard in Los Angeles, California. During the search, FBI agents found the Virginia driver's license of Cindy Lin and the Florida driver's license of Qin Ru Pan. Quin Ru Pan never gave the defendant permission to use her driver's license.

24. While the search was progressing, the defendant admitted to the FBI that she used the name Sau Hoong Lee, but that her name at birth was Siew Im Cheah. The defendant stated that her Malaysian passport, under the name Sau Hoong Lee, was currently in a safe deposit box in a Hong Kong and Shanghai Banking Corporation bank in New York.

25. This statement of facts includes those facts necessary to support the plea agreement between the defendant and the United States. It does not include each and every fact known to the defendant or to the United States, and it is not intended to be a full enumeration of all of the facts surrounding the defendant's case.

26. The actions of the defendant, as recounted above, were in all respects knowing and deliberate, and were not committed by mistake, accident, or other innocent reason.

Respectfully submitted,


G. Zachary Terwilliger
United States Attorney



By: Joseph Attias
Special Assistant United States Attorney

Gordon D. Kromberg
Assistant United States Attorney

After consulting with my attorney and pursuant to the plea agreement entered into this day between the defendant, SAU HOONG LEE, and the United States, I hereby stipulate that the above Statement of Facts is true and accurate, and that had the matter proceeded to trial, the United States would have proved the same beyond a reasonable doubt.

June 26 2019 
SAU HOONG LEE

I am Billy Hicks, defendant's attorney. I have carefully reviewed the above Statement of Facts with her. To my knowledge, her decision to stipulate to these facts is an informed and voluntary one.


Billy Hicks, Esq.
Attorney for SAU HOONG LEE